

STATE OF INDIANA)
) SS:
COUNTY OF MADISON)
) CAUSE NO.

CHRISTOPHER WILSON

VS.

SHARMA PULKIT and
VERMANI TRUCKING, INC.

COMPLAINT FOR DAMAGES

Comes now the Plaintiff, Christopher Wilson, by counsel, Bradford J. Smith of Ken Nunn Law Office, and for his cause of action against the Defendants, Sharma Pulkit and Vermani Trucking, Inc., alleges and states as follows:

STATEMENT AND JURISDICTION

1. This is a clear liability collision in which Defendants' 2020 Freightliner tractor and attached trailer was negligently driven by Sharma Pulkit, causing a collision with the vehicle driven by Plaintiff, Christopher Wilson. As a result of the collision, Plaintiff has incurred medical expenses, lost wages, property damage including, but not limited to, diminished value, and other special expenses in an amount to be proven at trial of this cause.

2. Jurisdiction and venue are appropriate in Madison County, Indiana, as said collision occurred within the boundaries of Madison County, State of Indiana.

FIRST CAUSE OF ACTION

NEGLIGENCE OF SHARMA PULKIT

3. Plaintiff realleges and incorporates herein by reference paragraphs 1 through 2 above as if fully restated verbatim.

4. On or about March 20, 2021, Defendant Sharma Pulkit negligently drove a tractor-trailer, striking the vehicle driven by Plaintiff, Christopher Wilson.

5. Defendant Sharma Pulkit had a duty to operate his tractor trailer in a safe and reasonable manner.

EXHIBIT "A"

6. Defendant Sharma Pulkit failed in the above mentioned duties and is therefore negligent.

7. Defendant Sharma Pulkit's negligence was the direct and proximate cause of Plaintiff's injuries.

8. Plaintiff Christopher Wilson's injuries and damages are permanent.

9. As a direct and proximate result of Sharma Pulkit's negligence, Christopher Wilson has suffered lost wages.

10. Plaintiff Christopher Wilson has incurred medical bills for the treatment of his injuries directly resulting from this collision.

11. As a direct and proximate result of Sharma Pulkit's negligence, Christopher Wilson has experienced physical and mental pain and suffering, lost wages, property damage including, but not limited to, diminished value, and has lost the ability to perform usual activities, resulting in a diminished quality of life.

SECOND CAUSE OF ACTION

NEGLIGENCE PER SE OF SHARMA PULKIT

12. Plaintiff realleges and incorporates herein by reference paragraphs 1 through 11 above as if fully restated verbatim.

13. Sharma Pulkit violated state and federal statutes and regulations including but not limited to Title 9 of the Indiana Code.

14. Defendant Sharma Pulkit's statutory violations directly and proximately caused Plaintiff's damages and injuries.

15. Defendant Sharma Pulkit is negligent per se based on these statutory and regulatory violations.

THIRD CAUSE OF ACTION

RESPONDEAT SUPERIOR OF VERMANI TRUCKING, INC.

16. Plaintiff realleges and incorporates herein by reference paragraphs 1

through 15 above as if fully restated verbatim.

17. Defendant Sharma Pulkit was the employee, agent, servant, or independent contractor for Vermani Trucking, Inc. Accordingly, Vermani Trucking, Inc. is vicariously liable for the acts of Defendant Sharma Pulkit for the causes of action above.

WHEREFORE, the Plaintiff, Christopher Wilson, by counsel, Bradford J. Smith of Ken Nunn Law Office, demands judgment against the Defendants, Sharma Pulkit and Vermani Trucking, Inc. for permanent injuries in a reasonable amount to be determined at the trial of this cause, for medical expenses, lost wages, property damage including, but not limited to, diminished value, and other special expenses, court costs and all other just and proper relief in the premises.

KEN NUNN LAW OFFICE

BY: s/ Bradford J. Smith

Bradford J. Smith, #22783-47

KEN NUNN LAW OFFICE

104 South Franklin Road

Bloomington, IN 47404

Phone: (812) 332-9451

Fax: (812) 331-5321

E-mail: brads@kennunn.com

REQUEST FOR TRIAL BY JURY

Comes now the plaintiff, by counsel, Ken Nunn Law Office, and requests that this matter be tried by jury pursuant to Trial Rule 38.

KEN NUNN LAW OFFICE

BY: s/ Bradford J. Smith

Bradford J. Smith, #22783-47

KEN NUNN LAW OFFICE

104 South Franklin Road

Bloomington, IN 47404

Phone: (812) 332-9451

Fax: (812) 331-5321

E-mail: brads@kennunn.com

Bradford J. Smith, #22783-47

Ken Nunn Law Office

104 South Franklin Road

Bloomington, IN 47404

Telephone: 812-332-9451

Fax Number: 812-331-5321

Attorney for Plaintiff